

EXHIBIT D

Draft of February 5, 2020

DRAFT — FOR DISCUSSION PURPOSES
FRE 408 / SUBJECT TO MEDIATION PRIVILEGE

MOVANTS' INFORMAL DOCUMENT REQUESTS RELATED TO PRIFA¹

REQUEST NO. 1

Documents sufficient to show each transfer and/or deposit of the Rum Taxes from the U.S. Treasury to the Commonwealth, the Puerto Rico Infrastructure Fund, or any lockbox account, and each subsequent transfer thereof, from July 1, 2015 to the present, including (a) the date of the transfer, (b) the transferor, (c) the transferee, (d) the amount of the transfer, (e) information sufficient to identify and distinguish particular accounts, (f) all account holders or beneficiaries, and (g) all transmittal information associated with the transfer, including, without limitation, all Fedwire or ACH transaction fields, memo lines, accompanying memoranda, beneficiary information, addenda information, or other remittance or reference information.

REQUEST NO. 2

Documents sufficient to show the total amount of Rum Taxes presently held by PRIFA, or the Commonwealth or its instrumentalities, including, without limitation, information sufficient to identify the particular account(s) where such funds are retained; each account holder, financial institution, and beneficiary; and the cash balance of the accounts.

REQUEST NO. 3

Documents, communications, or Agreements (including, without limitation, drafts thereof) to which the Commonwealth, the Rum Producers, and/or PRIFA is a party, relating to the Rum Taxes, the flow of funds for PRIFA bonds, and/or the use of Rum Taxes.

REQUEST NO. 4

All reports provided by PRIFA to the Legislature and Governor of Puerto Rico pursuant to the Enabling Act.

REQUEST NO. 5

All appropriation requests made by PRIFA for reimbursement of clawed-back Pledged Rum Taxes.

REQUEST NO. 6

Documents sufficient to show the total amount of money held by the Puerto Rico Infrastructure Fund and ownership information, including (a) where the fund is held, (b) information sufficient to identify and distinguish each particular account, (c) all account holders, (d) all account signatories, and (e) any entity or individual with authority over the account.

¹ Terms not defined herein have the same meaning as in the Amended PRIFA Lift Stay Motion (Case No. 17-3282, ECF No. 10,109).

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REQUEST NO. 7

Direction letters or other documents to or from any bank and/or the Secretary of the Treasury regarding the flow of funds and/or use of the Rum Taxes.

REQUEST NO. 8

Documents sufficient to show the terms, scope, and effects of purported restrictions placed on PRIFA-related funds, including but not limited to those funds described as “restricted” in the Commonwealth’s “Summary of Cash Restriction Analysis” dated Oct. 2, 2019.

REQUEST NO. 9

Documents sufficient to show the amount of Rum Taxes collected in each Fiscal Year from Fiscal Year 2016 to the present, including the amount of Rum Taxes collected in the current Fiscal Year.